

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS

DOUGLAS JOHNSON,	)	
	)	
Plaintiff,	)	22-cv-3718
v.	)	
	)	
COOK COUNTY SHERIFF THOMAS	)	Hon. Robert W. Gettleman
DART, in his official capacity,	)	Hon. Mag. Heather K. McShain
ANTWAUN BACON, a CCDOC officer, and	)	
COOK COUNTY, a municipal corporation,	)	
	)	
Defendants.	)	

**(AGREED) MOTION FOR EXTENSION OF  
TIME TO COMPLETE LIMITED FACT DISCOVERY**

The Plaintiff, DOUGLAS JOHNSON, by and through his attorneys of Dvorak Law Offices, LLC hereby respectfully requests that fact discovery be extended by an additional 30 days, from February 27, 2023, up to and including March 29, 2023. In support of his motion, the Plaintiff states the following:

1. The parties have exchanged written discovery.
2. The Plaintiff's deposition was taken on February 6, 2024.
3. Defendant Bacon's deposition was taken on February 14, 2024.
4. Treating physician Dr. Patrick Ennis's subpoena would have had him deposed on February 22, 2024. However, his attorney has indicated that he cannot appear on that date and both he and the parties have agreed to a deposition date of March 7, 2024.
5. On January 12, 2024, the Plaintiff noticed the depositions of Defendant Sheriff's Employees Orr and Purcell for February 19, 2024, and submitted a 30(b)(6) notice for a designated witness to testify regarding Cook County Jail policies on a proposed date of February 12, 2024.

6. Pursuant to a staffing change at the Civil Division of the Cook County State's Attorney's Office, a new Assistant State's Attorney, Mr. O'Connor, has been assigned to handle this matter. He filed his appearance on February 16, 2024.
7. Counsel for the Sheriff were unable to produce the controlled Sheriff's witnesses on the dates proposed by the Plaintiff and do not believe they will be available before the February 27, 2023, close of discovery.
8. The Parties agree that they will take no depositions other than those identified in this motion.
9. Counsel for the Defendants have indicated their agreement to this motion.

Wherefore, in the light of the staffing change at the State's Attorney's Office and the difficulty coordinating schedules of witnesses, the Plaintiff asks that this Court grant the parties an additional 30 days, up to and including March 29, 2024, to complete discovery with respect to the above-described depositions *only*.

Date: February 21, 2024

*Counsel for the Plaintiff*

Respectfully Submitted,  
/s/ Adrian Bleifuss Prados

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CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that on February 21, 2024, he caused the attached motion to be served upon counsel of record via the Court's electronic filing system.

Respectfully Submitted,  
/s/ Adrian Bleifuss Prados

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